

The Honorable John C. Coughenour

UNITED STATE DISTRICT COURT  
WESTERN DISTRICT OF WASHINGTON  
AT SEATTLE

PATRICK S. DRAGOS,

Plaintiff(s),

v.

MICHAEL G. CORNEA, ET AL.,

Defendant(s).

No. 2:19-cv-01338-JCC-TLF

**DECLARATION OF ERIC S.  
CHAVEZ IN SUPPORT OF  
DEFENDANT CORNEA'S MOTION  
TO AMEND ANSWER**

**NOTED FOR CONSIDERATION:  
APRIL 10, 2020**

I, Eric S. Chavez, declare that the following is true and correct subject to penalty of perjury under the laws of Washington State:

1. I am the attorney represented Defendant Cornea in this matter. I am over 18 years of age, have personal knowledge of the matters herein, and am otherwise competent to testify.

2. Attached hereto as **Exhibit 1** is a true and correct copy of Plaintiff Dragos' responses to Defendant Cornea's First Set of Interrogatories and Requests for Production. These responses were received on January 7, 2020.

3. Attached hereto as **Exhibit 2** is a true and correct copy of Plaintiff Dragos' responses to Defendant Cornea's Second Set of Interrogatories and Requests for Production. These responses were received on March 13, 2020.

DECLARATION OF ERIC S. CHAVEZ IN SUPPORT OF  
DEFENDANT CORNEA'S MOTION TO AMEND ANSWER- 1  
No. 2:19-cv-01338-JCC-TLF

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1           4.       Attached hereto as **Exhibit 3** is a true and correct copy of relevant portions of  
2 Plaintiff Dragos' deposition transcript.

3           5.       Defendant Cornea did not become aware of Plaintiff's subsequent collision with  
4 non-party Coquese Renfroe until after the deadline for amendment pleadings had passed at  
5 plaintiff's deposition on December 4, 2019. Thereafter, defendant served a second set of  
6 discovery requests on plaintiff on or about January 8, 2020. These interrogatories and requests  
7 for production were drafted to discover the identity of the at-fault party for the November 2019  
8 accident, as well as whether plaintiff was alleging injuries and treatment as a result of that  
9 accident. Plaintiff did not provide responses to these discovery requests until March 13, 2020.

10          6.       Attached hereto as **Exhibit 4** is a proposed Amended Answer adding Coquese  
11 Renfroe as an additional non-party at fault.

12  
13           SIGNED this 2<sup>nd</sup> day of April, 2020, in Davis, California.

14  
15           /s/ Eric S. Chavez  
16 Eric S. Chavez, WSBA #41676  
17 Mix Sanders Thompson, PLLC  
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20 Phone: (206) 521-5989  
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22 Email: [eric@mixsanders.com](mailto:eric@mixsanders.com)  
23 *Attorney for Defendant*  
24

**CERTIFICATE OF SERVICE**

I, Kaci Clariza, certify that on April 2, 2020, I caused to be served a true and correct copy of the foregoing DECLARATION OF ERIC S. CHAVEZ IN SUPPORT OF DEFENDANT CORNEA'S MOTION TO AMEND ANSWER with the Clerk of the Court using the CM/ECF System and caused to be served a true and correct copy via the method indicated below and addressed to the following

Bryan Prince-Olsen  
GLP Attorneys, P.S., Inc.  
2601 4th Ave Fl 6  
Seattle, WA 98121-1287  
*Attorney for Plaintiff*  
☐ Legal Messenger  
☐ U.S. Mail  
☐ Hand Delivered  
☒ ECF

I certify under penalty of perjury under the laws of the state of Washington that the foregoing is true and correct.

s/Kaci Clariza  
Kaci Clariza  
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